

MEMO ENDORSED

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Gerald J. Di Chiara
Attorney at Law
585 Stewart Avenue
Garden City, N.Y. 11530
(212) 679-1958

Laura Di Chiara, Esq.

May 27, 2021

Judge Valerie Caproni
U.S. District Court
Southern District of New York
500 Pearl Street
N.Y., N.Y. 10007

Re: **U.S. v. Juan Hernandez,**
19 Cr. 862 (VEC)

Dear Judge Caproni,

Pursuant to an Order of November 10, 2020, the Court authorized the appointment of Nicholas J. Pinto, as associate counsel for Juan Hernandez, pursuant to the Criminal Justice Act.

On May 4, 2021 Mr. Pinto exhausted the 30 hours authorized to him, pursuant to that Order. Mr. Pinto has primarily focused on an analyses of the client's criminal and medical history and issues while I have concentrated primarily on the vast amount of voluminous discovery and plea negotiations with the government. Because of the pandemic, Mr. Pinto initially visited Mr. Hernandez at the MDC, by himself, to review certain aspects of the discovery, as well as, conduct discussions relating to plea negotiations. Counsel have also had numerous legal calls with Mr. Hernandez.

The appointment has proven to be invaluable in the representation of Mr. Hernandez who has had a history of drug, medical and mental issues. Mr. Pinto has developed a trusting and professional relationship with the client which has led to the potential resolution of this matter. The case is scheduled for a plea hearing on June 9, 2021. His relationship with the client and continued work in organizing and analyzing the client's condition will be of great assistance in preparing for sentencing.

It is respectfully requested that the Court authorize an additional 20 hours for Mr. Pinto, Nunc Pro Tunc from May 4, 2021, to continue his work and permit him to continue in assisting in the representation of Mr. Hernandez both for the plea and sentencing.

Sincerely,

/s/ Gerald J. Di Chiara

Given the upcoming plea proceeding and the current status of this matter, the Court authorizes 10 additional hours for Mr. Pinto for work completed from May 4, 2021 through Mr. Hernandez's sentencing.

So Ordered: Valerie Caproni
Judge Valerie Caproni

Date: June 2, 2021